Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Jim McLaughlin
Title: Executive Director - Operations

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-59   Has Verizon conducted any analyses to determine whether the
                         increase in hot cut volumes that it has estimated will occur as a
                         result of the elimination of UNE-P, and the additional
                         personnel required to meet these volumes, will affect service
                         quality associated with hot cuts? If yes, please provide all
                         studies, work papers and documents created in connection
                         with such analyses.

REPLY: No. Verizon MA has not conducted any formal analyses to
                         determine impacts of higher hot cut volume on service quality.
                         However, Verizon MA believes that it will be able to maintain
                         its high levels of service quality.

                                                                    VZ # 173

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: Kevin Van Inwegen
Title: Manager - Wholesale

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-60   For the latest six months for which such information is available, please indicate the average number of lines per LSR included in hot cut requests to Verizon, and break out this number by Basic Hot Cuts and Large Job Hot Cuts.

REPLY: Verizon does not have the information separated by hot cut type as requested, however, for all hot cut orders, for the 6-month period from June 2003 through November 2003, there were approximately 2 lines per order. This information is based on data published in the monthly C2C Reports for Massachusetts.

                                                                         VZ # 174

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: <u>Eugene J. Goldrick</u>
Title: <u>Statistician</u>

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-73   For each survey document produced in response to ATT-VZ-
                     72 that contains a response that was not used to calculate
                     statistical results, please identify the particular response and
                     explain why it was not used.

REPLY: Please see the attached file that contains copies of completed
                     survey responses that were not included in the calculation of
                     statistical results. The completed survey responses provided in
                     the file were not used because data was incomplete or
                     inconsistent. The incomplete or inconsistent data could not be
                     completed or corrected for use in calculating statistical results.
                     The attached file is proprietary, confidential and competitively
                     sensitive and is being provided in accordance with the terms of
                     the Department's Protective Order. A copy is being provided
                     only to AT&T and the Department. Copies will be made
                     available to other parties upon request.

VZ # 187

Verizon New England Inc.
d/b/a Verizon Massachusetts

Commonwealth of Massachusetts

Docket No. 03-60

Respondent: <u>John Livecchi</u>
Title: <u>Director- Network Engineering</u>

REQUEST: AT&T Communications of New England, Inc., Set #2

DATED: December 22, 2003

ITEM: AT&T 2-87   At p. 6 of Verizon's Supplemental Initial Panel Testimony, Verizon states that the "APC handles orders that fall out of the automatic assignment process because of facilities problems." What facilities problems, other than the presence of IDLC technology, would require the involvement of the APC? What percentage of LSRs would contain each of these problems?

REPLY: In addition to orders that "fall out" of the automatic assignment process due to problems with outside plant facilities, the APC handles orders that "fall out" due to central office facilities problems, such as a lack of office equipment or tie pairs to complete the order. Orders also fall out when there is a discrepancy between the cable facility assignment (CFA) the CLEC provided as being spare or available and what Verizon's records or the frame indicates as working. These facilities assignments are identified by the CLEC on the LSR and subsequent service order. The orders either "fallout" to the APC or are "jep'd" (jeopardy) back to the APC by the frame personnel to investigate the records or jep'd back to the NMC to be queried back to the CLEC for clarification.

Verizon MA does not track the number or percentage of LSRs that would contain these problems.

VZ # 201